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**Re: *United States v. Giampietro*, Case No. 2:19-cr-00013 (U.S.D.C. M.D. Tenn.)**

Dear Counsel:

As we proceed closer to trial, I wanted to let you know that at trial, the Government intends to offer evidence to show that the defendant attempted to provide material support and resources to a foreign terrorist organization when she conducted financial transactions and provided money to various entities supportive of the Mujahedeen (i.e. fighters) in Syria, in addition to the manners previously identified in the Superseding Indictment: personnel and services.

One, the Government will offer evidence that the defendant was in contact with “@MuhamedAA” between May 2018 and June 2018 and inquired how to send money and how much money to send. Evidence will be offered that shows “@MuhamedAA” is the administrator for “@remindersfromSyria,” an entity that solicits money for the Mujahedeen.

Two, the Government will present evidence that the defendant sent \$150 to “Muhammed Muhammed” on or about June 14, 2018, associated with international telephone number 905373777140. Evidence will link this phone number to “@Alsadaqahsyria,” an online handle operating a Syria-based organization that solicits funds online to aid the Mujahedeen in Syria.

Three, the Government will present evidence that in March 2018, the defendant engaged in conversations with an FBI Undercover Employee (“UCE”) who was posing as a like-minded sister, meaning a female individual who was supportive of radical ideologies in the Islamic faith. When the UCE asked the defendant for a contact to whom the UCE could send money to support

the Mujahedeen, the defendant provided UCE with contact information for Merciful Hands, advising UCE that the individual behind Merciful Hands is a “trusted brother.” Subsequently, in two separate financial transactions: on June 20, 2018, and June 25, 2018, the defendant sent \$200 and \$500, respectively, to Merciful Hands. According to information posted to the Merciful Hands social media platform, Merciful Hands was seeking donations to support foreign fighters during the time that the defendant provided its information to UCE and during the time that the defendant contributed money.

Finally, the Government will offer evidence that in the fall of 2018, the defendant attempted to provide material support and resources to an FTO when she provided advice and assisted UCE and UCE’s husband in traveling to Syria to join HTS. Materials related to each of the above-described events was previously provided in discovery and referenced in a number of court filings.

The above does not detail all the evidence the Government intends to introduce at trial, but rather, provides a summary of the means by which the defendant committed the crime of Attempting to Provide Material Support to an FTO, in violation of Title 18, United States Code, Section 2339B, all of which are acts encompassed by the statutory definition of “material support and resources” as set forth in 18 U.S.C. § 2339A(b)(1). Accordingly, the Government gives notice of its intent to present evidence and argument regarding all the means identified above to prove that the defendant attempted to provide material support and resources to an FTO, as charged in this case.

Thank you and please do not hesitate to contact me at (615) 401-6604 or on my cell phone.

Sincerely,

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